

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 18-292
)	
ROBERT BOWERS)	

**NOTICE OF INTENT TO FILE A RESPONSE TO THE GOVERNMENT’S
BRIEF IN SUPPORT OF ITS MOTION TO EXAMINE MR. BOWERS AND
PROPOSED EXAMINATION PROCEDURES (ECF 1059)**

In its brief in support of broad and unlimited access to Mr. Bowers, the government provided, for the first time, the legal support for its Motion to Examine. ECF 1059; *see* ECF 1001 (“[T]he government presents only its proposed procedures. **It defers the recital of legal justification for such proposals** pending the outcome of the meet-and-confer process.”) (emphasis added). Not only does the brief in support rely upon legal arguments that Mr. Bowers has not yet had an opportunity to address, it also appears to expand the scope of the requests originally set forth in the government’s Motion to Examine.

Given the critical importance of these issues and the constitutional and statutory protections at issue, the defense provides notice that it intends to file a response to the government’s brief within the next 7 days.

Respectfully submitted,

/s/ Judy Clarke

Judy Clarke

Clarke Johnston Thorp & Rice, PC

/s/ Michael N. Burt

Michael N. Burt

Law Offices of Michael Burt, PC

/s/ Michael J. Novara

Michael J. Novara

First Assistant Federal Public Defender

/s/ Elisa A. Long

Elisa A. Long

Supervisory Assistant Federal Public Defender

/s/ Ashwin Cattamanchi

Ashwin Cattamanchi

Assistant Federal Public Defender